

COMMONWEALTH OF MASSACHUSETTS
Department of Telecommunications and Energy

**RESPONSE OF THE ATTORNEY GENERAL TO THE
SECOND SET OF INFORMATION REQUESTS FROM THE
BAY STATE GAS COMPANY
DTE 05-27**

Dated: August 2, 2005

Responsible Party: Jon Cavallo

BSG-AG-2-13 Please refer to the Cavallo Testimony at 4, lines 16-21. Please define “atmospheric and buried structures” and describe with particularity each and every such structure (by date, name, location and client) for which Mr. Cavallo advised, evaluated or developed coating specifications, as set forth in that paragraph.

Response: “Atmospheric” structures are those above ground, and “buried” structures are those below ground. Mr. Cavallo’s work for gas distribution companies and pipeline companies is listed in the response to BSG-AG-2-19. Mr. Cavallo’s work during the 35 years of his career has involved literally hundreds of atmospheric and buried structures, and he does not maintain an archival project diary that would enable him to readily identify “each and every such structure.”